

EXHIBIT D

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11
:
Gawker Media LLC, *et al.*,¹ : Case No. 16-11700 (SMB)
:
Debtors. : (Jointly Administered)
:
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**ORDER APPROVING MOTION OF RYAN GOLDBERG TO
ENFORCE ORDER CONFIRMING AMENDED JOINT CHAPTER 11 PLAN
OF LIQUIDATION AND TO BAR AND ENJOIN CREDITORS
FROM PROSECUTING THEIR STATE COURT ACTIONS**

Upon consideration of the Motion of Ryan Goldberg (“Goldberg”) for entry of an order to enforce the Plan and Confirmation Order and to bar and enjoin Pregame and Busack from prosecuting the claims and causes of action asserted against Goldberg in the Civil Suit (the “Motion”),² the Court finds that: (i) it has jurisdiction over the matters raised in the Motion; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) notice of the Motion and any hearing thereon was sufficient, proper, and adequate; and (iv) upon the record herein and after due deliberation thereon, good and sufficient cause exists for the granting of the relief as set forth herein. Accordingly, the Court hereby ORDERS that:

1. The Motion is GRANTED in all respects; and
2. Pregame and Busack shall immediately take all necessary action, at their sole cost and expense, to effectuate the dismissal with prejudice of the causes of action asserted against

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Kinja Kft. (5056). Gawker Media LLC and Gawker Media Group, Inc.’s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10020. Kinja Kft.’s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10020.

² Defined terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

Goldberg in the civil action captioned *PREGAME LLC d/b/a PREGAME.COM, a Nevada limited liability company and RANDALL JAMES BUSACK [sic], professionally known as RJ BELL, Plaintiffs, against Gizmodo Media Group, LLC, a Delaware Corporation, Ryan Goldberg and DOES 1-20, Inclusive, Defendants*, Index No. 155710/2017, pending in the Supreme Court for the State of New York, County of New York (the “Civil Suit”), including signing and filing such pleadings as are necessary and appropriate in furtherance thereof; and

3. Pregame and Busack are each hereby directed to immediately cease and refrain from any further acts to prosecute or continue the claims and causes of action asserted against Goldberg in the Civil Suit (whether in the Supreme Court for the State of New York or any other court) or to, in any other manner, seek to enforce such claims and causes of action against Goldberg; and

4. Goldberg is hereby awarded his costs and attorneys’ fees incurred in connection with the preparation, filing, and arguing of the Motion and defending the underlying Civil Suit. Such fees shall be assessed against Pregame and Busack for their knowing violations of the Plan and Confirmation Order.

Dated: _____, 2017
New York, New York

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE